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**UNITED STATES DISTRICT COURT FOR THE**  
2007 JUL -2 **DISTRICT OF PUERTO RICO**

CLERK'S OFFICE  
U.S. DISTRICT COURT  
SAN JUAN, P.R.

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**LUIS R. RODRIGUEZ-BENITEZ**  
**Petitioner**

**vs.**

**CASE NO. 99 CR 332-02 (DRD)**

**UNITED STATES OF AMERICA**  
**Respondent**

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**MOTION FOR MODIFICATION OF SUPERVISED  
RELEASE IN EX-PARTE PURSUANT TO  
TITLE 18 U.S.C.A. 3583 (e) (1)**

**COMES NOW**, Luis R. Rodríguez-Benítez, the Petitioner, pro-se, respectfully to this Honorable Court, in ex-parte with this Motion for Modification of Supervised Release pursuant to Title 18 U.S.C.A. 3583 (e) (1).

**STATEMENT OF FACTS**

On December 15, 2000, the petitioner was sentenced to sixty-eight (68) months imprisonment and four (4) years of supervised release by the Honorable Judge Daniel R. Domínguez, for violation of Title 21 U.S.C.A. 846.

The relevant statute provides that the Court may, after considering the factors set forth in Section 3583 (a) (1), (a) (2) (c), (a) (4), (a) (5) and (a) (6), terminate a term of supervised release and discharge the defendant released at any time after the expiration of one (1) year of supervision, pursuant to the provisions of the Federal Rules of Criminal Procedure, relating to the modification of probation, if it is satisfied that such action is warranted by the conduct of the defendant released and in the interest of justice.

The petitioner, Luis R. Rodríguez-Benítez, has completed thirty-three (33) months of supervision with no unfavorable reports.

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The Petitioner avers that since his release, he has maintained a stable home environment, currently living with his wife and his two (2) children; has been gainfully employed since his release as a Manager at the Caribe Hilton Hotel and presently, as Engineering Supervisor at the San Juan Beach & Water Club Hotel. Petitioner was nominated as Employee of the Month in July, 2006, and selected as Employee of the Month in August, 2006 (Appendix A). He has provided community services by coaching a Little League baseball team (Cachorritos Baseball Club) at the Juan Almeyda Baseball League, in Guaynabo, Puerto Rico. In addition, Petitioner was recognized for his volunteer services by the Antilles Intermediate School at the Fort Buchanan Army Base, Guaynabo, Puerto Rico (Appendix B). Petitioner has also continued his program of recovery as an active member of Narcotics Anonymous, maintaining drug-free. Since his release the Petitioner has not had any other incidents with the law and has been in full compliance with the terms and conditions of his supervision, and has become an accepted, responsible and productive member of society.

The exemplary representation of petitioner's rehabilitation at home, work, the community and responsibilities with his supervised release, the public interest is best served by terminating the terms imposed for supervised release, which will allow the U.S. Probation Office to invest their resources on those who are in need of supervision.

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**WHEREFORE**, the petitioner prays that this Honorable Court terminate petitioner's term of Supervised Release pursuant to it's discretionary authority under Title 18 U.S.C.A. 3583 (e) (1).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Luis R. Rodríguez Benítez". The signature is fluid and cursive, with the last name "Benítez" being more prominent.

Luis R. Rodríguez-Benítez  
Petitioner

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